

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**MOTORS LIQUIDATION COMPANY, et al.,
f/k/a/ General Motors Corp., et al**

**Chapter 11 Case No.
09-50026**

DEBTORS

(Jointly Administered)

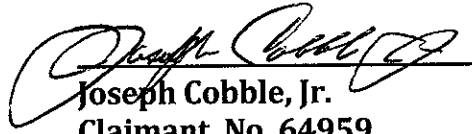
**RESPONSE AND OBJECTION TO DEBTOR'S EIGHTY-THIRD OMNIBUS
OBJECTIONS TO CLAIMS**

**NOW COMES CLAIMANT, JOSEPH COBBLE JR., CLAIM NUMBER 64959, and
hereby Objects to the Eighty-Third Omnibus Objection to Claims for the
following reasons:**

- 1. That the Debtor's Objection is based on the allegation that "the Debtors are not liable" to pay and satisfy your Claimant's claim.**
- 2. That said allegation is incorrect.**
- 3. That the subject claim is for continuation of an earned and accrued benefit, to wit: the continuing lifetime coverage and the future payment at the time of your Claimant's death of Continuing Life Insurance benefits in the amount of \$122,049.00 pursuant to the Debtor's Life and Disability Program.**
- 4. That said benefits were earned by your Claimant based upon his thirty-two (32) years of employment with Debtor as an engineering group manager at the time of his retirement in 2002.**
- 5. That said earned and accrued benefit was acknowledged by Debtor in a writing dated April 8, 2002.**
- 6. That a copy of said written acknowledgment is attached as Exhibit 1 and is incorporated by reference.**

WHEREFORE, Claimant respectfully requests this Court Deny Debtor's Eighty-Third Omnibus Objections to Claims and allow Claimant's Claim as previously filed with the Court.

Respectfully submitted,


Joseph Cobble, Jr.
Claimant, No. 64959

August 30, 2010

RETIREE SERVICING CENTER
P.O. Box 5113
Southfield, Michigan 48086-5113
1-800-828-9236
1-800-872-8682
TELECOMMUNICATION DEVICE FOR THE DEAF

Apr 08, 2002

Joseph W Cobble, Jr.
2134 St. Andrews
Rochester Hills, MI 48309

Dear Joseph W Cobble, Jr.:

As a retiree of General Motors with 10 or more years of participation in the Life and Disability Benefits Program, you are eligible for Continuing Life Insurance.

Our insurance records, as of the date of this letter, show the Continuing Life Insurance has now fully reduced to the ultimate amount of **\$122,049.00**. This ultimate amount will remain in effect for the rest of your life and is provided by General Motors at no cost to you.

This is not a guarantee of the coverage amount.

IMPORTANT: YOU SHOULD KEEP THIS NOTICE WITH YOUR OTHER VALUABLE PAPERS.

If you have any questions regarding this letter, you may call toll-free, **1-800-828-9236** (Telecommunication Device for the Deaf **1-800-872-8682**), during normal business hours, or write to the address above.

Always include this Social Security number, [REDACTED], in all your correspondence.

Retiree Servicing Center

UA01

EXHIBIT

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PROOF OF SERVICE

NOW COMES CLAIMANT, JOSEPH COBBLE JR., CLAIM NUMBER 64959, and hereby states and affirms that he served a copy in both electronic and paper form of his Response and Objections to the Debtor's Eighty-Third Omnibus Objection to Claims on the following persons and parties in interest by first class United States mailing with postage fully prepaid:

**WEIL, GOTSHAL & MANGES, LLP
767 FIFTH AVENUE
NEW YORK, NEW YORK 10153
Att: Harvey R. Miller, Esq., Stephen Karotkin, Esq., & Joseph Smolinsky, Esq.**

**DEBTORS, c/o MOTORS LIQUIDATION CO.
500 RENAISSANCE CENTER, SUITE 1400
DETROIT, MI 48243
Att: Ted Stenger**

**GENERAL MOTORS, LLC
400 RENAISSANCE CENTER
DETROIT, MI 48265
Att: Lawrence S. Buonomo, Esq.**

**CADWALADER, WICKERSHAM & TAFT, LLP
Attorneys for US Dept. of Treasury
ONE WORLD FINANCIAL CENTER
NEW YORK, NEW YORK 10281
Att: John J. Rapisardi, Esq.**

**US DEPT. OF TREASURY
1500 PENNSYLVANIA AVENUE, ROOM 2312
WASHINGTON, D.C. 20220**

Att: Joseph Samarias, Esq.

**VEDDER, PRICE PC
1633 BROADWAY, 47th FLOOR
NEW YORK, NEW YORK 10019**

Att: Michael J. Edelman, Esq., & Michael L. Schein, Esq.

**KRAMER LEVIN NAFTALIS & FRANKEL, LLP
1177 AVANUE OF THE AMERICAS
NEW YORK, NEW YORK 10036**

**Att: Thomas M. Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq.
And Jennifer Sharret, Esq.**

**OFFICE OF THE US TRUSTEE FOR SOUTHERN DISTRICT OF NEW YORK
33 WHITEHALL STREET, 21st FLOOR
NEW YORK, NEW YORK 10004
Att: Tracey H. Davis, Esq.**

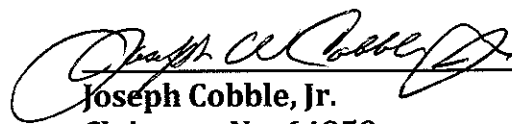
**U.S./ATTORNEY'S OFFICE, S.D.N.Y.
86 CHAMBERS STREET, THIRD FLOOR
NEW YORK, NEW YORK 10007
Att: David S. Jones, Esq & Naatalie Kuehler, Esq.**

**CAPLIN & DRYSDALE, CHARTERED
375 PARK AVENUE, 35th FLOOR
NEW YORK, NEW YORK 10152-3500
Att: Elihu Inselbuch, Esq. & Rita C. Tobin, Esq.**

**CAPLIN & DRYSDALE, CHARTERED
ONE THOMAS CIRCLE, N.W., SUITE 1100
WSASHINGTON, D.C. 20005
Att: Trevor W. Swett III, Esq. & Kevin C. Maclay, Esq.**

**STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, P.C.
2323 BRYAN STREET, SUITE 2200
DALLAS, TEXAS 75201
Att: Sander L. Esserman, Esq. & Robert T. Brousseau, Esq.**

Respectfully submitted,


**Joseph Cobble, Jr.
Claimant, No. 64959**

August 30, 2010